

Appendix A

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF TEXAS  
DIVISION

United States Courts  
Southern District of Texas  
FILED

May 21, 2020

David J. Bradley, Clerk of Court

Natalie M. Wurf

versus

United Airlines  
233 South Wacker Drive  
Chicago, IL 60606

§  
§  
§  
§  
§  
§  
§

CIVIL ACTION NO. \_\_\_\_\_

**4:20cv1800**

EMPLOYMENT DISCRIMINATION COMPLAINT

1. This action is brought under Title VII of the Civil Rights Act of 1964 for employment discrimination. Jurisdiction is conferred by Title 42 United States Code, Section § 2000e-5.

2. The Plaintiff is:

Natalie M. Wurf

Address:

29602 Clover Shore Drive

Spring Texas 77381

County of Residence:

M

3. The defendant is:

United Airlines

Address:

233 South Wacker Drive

Chicago, IL 60606

☐ Check here if there are additional defendants. List them on a separate sheet of paper with their complete addresses.

8-7-2019

4. The plaintiff has attached to this complaint a copy of the charges filed on 2-19-2020

with the Equal Opportunity Commission.

5. On the date of 2-19-2020, the plaintiff received a Notice of Right to Sue

letter issued by the Equal Employment Opportunity Commission; a copy is attached.

6. Because of the plaintiff's:

- (a) ☒ race
- (b) ☐ color
- (c) ☐ sex
- (d) ☐ religion
- (e) ☐ national origin,

the defendant has:

- (a) ☐ failed to employ the plaintiff
- (b) ☐ terminated the plaintiff's employment
- (c) ☐ failed to promote the plaintiff
- (d) ☒ other:

Race Retaliation, Bad  
Work Environment

Supervision Lead treat me very  
Bad.

7. When and how the defendant has discriminated against the plaintiff:

The company has been very rude,  
also Retaliation against me, because of  
statements I've written in the pass.  
I'm working in a Bad environment.

8. The plaintiff requests that the defendant be ordered:

- (a) ☒ to stop discriminating against the plaintiff
- (b) ☐ to employ the plaintiff
- (c) ☐ to re-employ the plaintiff
- (d) ☐ to promote the plaintiff

(e) ☐ to \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_ and that;

(f) ☐ the Court grant other relief, including injunctions, damages, costs and attorney's fees.

  
(Signature of Plaintiff)

Address: 29602 clover shore Drive  
Spring Texas 77386  
Telephone: 562 756-7365

EEOC Form 5 (11/09)

<b>CHARGE OF DISCRIMINATION</b> <small>This form is affected by the Privacy Act of 1974. See enclosed Privacy Act Statement and other information before completing this form.</small>		Charge Presented To:      Agency(ies) Charge No(s): <div style="display: flex; justify-content: space-between;"> <div> <input type="checkbox"/> FEPA  <input checked="" type="checkbox"/> EEOC         </div> <div style="text-align: right;"> <b>460-2019-03680</b> </div> </div>	
<b>Texas Workforce Commission Civil Rights Division</b> and EEOC <small>State or local Agency, if any</small>			
Name (indicate Mr., Ms., Mrs.) <b>Ms. Natalie M. Ward-Thompson</b>		Home Phone (Incl. Area Code) <b>(562) 756-7365</b>	Date of Birth <b>1962</b>
Street Address      City, State and ZIP Code <b>29602 Clover Shore Dr, Spring, TX 77386</b>			
Named is the Employer, Labor Organization, Employment Agency, Apprenticeship Committee, or State or Local Government Agency That I Believe Discriminated Against Me or Others. (If more than two, list under PARTICULARS below.)			
Name <b>UNITED AIRLINES</b>		No. Employees, Members <b>500 or More</b>	Phone No. (Include Area Code) <b>(281) 553-1012</b>
Street Address      City, State and ZIP Code <b>3500 North Terminal Road, Houston, TX 77205</b>			
DISCRIMINATION BASED ON (Check appropriate box(es).) <div style="display: flex; flex-wrap: wrap; padding: 5px;"> <div style="margin-right: 10px;"><input checked="" type="checkbox"/> RACE</div> <div style="margin-right: 10px;"><input type="checkbox"/> COLOR</div> <div style="margin-right: 10px;"><input type="checkbox"/> SEX</div> <div style="margin-right: 10px;"><input type="checkbox"/> RELIGION</div> <div style="margin-right: 10px;"><input type="checkbox"/> NATIONAL ORIGIN</div> <div style="margin-right: 10px;"><input checked="" type="checkbox"/> RETALIATION</div> <div style="margin-right: 10px;"><input type="checkbox"/> AGE</div> <div style="margin-right: 10px;"><input type="checkbox"/> DISABILITY</div> <div style="margin-right: 10px;"><input type="checkbox"/> GENETIC INFORMATION</div> <div style="margin-right: 10px;"><input type="checkbox"/> OTHER (Specify)</div> </div>		DATE(S) DISCRIMINATION TOOK PLACE <div style="display: flex; justify-content: space-between;"> <div>           Earliest  <b>08-07-2019</b> </div> <div>           Latest  <b>08-07-2019</b> </div> </div> <div style="text-align: right; padding-top: 10px;"> <input checked="" type="checkbox"/> CONTINUING ACTION         </div>	
THE PARTICULARS ARE (If additional paper is needed, attach extra sheet(s)):  <p><b>On or around July 21, 2018, I was called a "Black Bitch" by a Lead (name unknown). On or around July 21, 2018 I complained to Danny Thomas, Acting Manager about the racist comment. Nothing was done. On or around July 22, 2018, I complained to the Company's harassment and discrimination hot line, UA/Ethnics about Gary's racist comments. Nothing was done.</b></p> <p><b>Gary treated me and all the Black ramp agents different from non-Black ramp agents, for example, Mr. Hill makes Black agents work non-stop, while the non-black ramp agents sit in the break room. I made a complaint to Becky (last name unknown), shift supervisor, about Gary working the Black ramp agents non-stop and not the non-Black ramp agents. I complained to shift supervisor, Mr. Eato about Gary's racist text and emails on Facebook. Nothing was done about it. After I made complaints to several supervisors of disparate treatment in the workplace against me and the other Black ramp agents, Gary began harassing me daily. Gary switches me from gate to gate all-night unnecessarily. Usually several ramp employees work on different gates. Also, Dave Canales, ramp supervisor, retaliated against me by writing me up for just asking a question about overtime. I had never been written up for anything during my tenure. Dave and Gary are buddies.</b></p> <p><b>I have been discriminated against because of my race, Black and retaliated against for complaining of being discriminated against in violation of Title VII of the Civil Rights Act of 1964, as amended.</b></p>			
I want this charge filed with both the EEOC and the State or local Agency, if any. I will advise the agencies if I change my address or phone number and I will cooperate fully with them in the processing of my charge in accordance with their procedures.  I declare under penalty of perjury that the above is true and correct.		NOTARY – When necessary for State and Local Agency Requirements  I swear or affirm that I have read the above charge and that it is true to the best of my knowledge, information and belief. SIGNATURE OF COMPLAINANT   SUBSCRIBED AND SWORN TO BEFORE ME THIS DATE (month, day, year)	
<div style="display: flex; justify-content: space-between; align-items: flex-end;"> <div> <b>Aug 19, 2019</b>            Date         </div> <div>             Charging Party Signature         </div> </div>		(This area is reserved for the Notary Public's signature and stamp.)	

EEOC Form 161-B (11/16)

## U.S. EQUAL EMPLOYMENT OPPORTUNITY COMMISSION

## NOTICE OF RIGHT TO SUE (ISSUED ON REQUEST)

To: **Natalie M. Ward-Thompson**  
**29602 Clover Shore Dr**  
**Spring, TX 77386**

From: **Houston District Office**  
**Mickey Leland Building**  
**1919 Smith Street, 7th Floor**  
**Houston, TX 77002**

☐

On behalf of person(s) aggrieved whose identity is  
 CONFIDENTIAL (29 CFR §1601.7(a))

EEOC Charge No.

EEOC Representative

Telephone No.

**460-2019-03680**

**Samantha Salazar,**  
**Investigator**

**(346) 327-7697**

(See also the additional information enclosed with this form.)

## NOTICE TO THE PERSON AGGRIEVED:

**Title VII of the Civil Rights Act of 1964, the Americans with Disabilities Act (ADA), or the Genetic Information Nondiscrimination Act (GINA):** This is your Notice of Right to Sue, issued under Title VII, the ADA or GINA based on the above-numbered charge. It has been issued at your request. Your lawsuit under Title VII, the ADA or GINA **must be filed in a federal or state court WITHIN 90 DAYS of your receipt of this notice**; or your right to sue based on this charge will be lost. (The time limit for filing suit based on a claim under state law may be different.)

☒

More than 180 days have passed since the filing of this charge.

☐

Less than 180 days have passed since the filing of this charge, but I have determined that it is unlikely that the EEOC will be able to complete its administrative processing within 180 days from the filing of this charge.

☒

The EEOC is terminating its processing of this charge.

☐

The EEOC will continue to process this charge.

**Age Discrimination in Employment Act (ADEA):** You may sue under the ADEA at any time from 60 days after the charge was filed until 90 days after you receive notice that we have completed action on the charge. In this regard, **the paragraph marked below applies to your case:**

☐

The EEOC is closing your case. Therefore, your lawsuit under the ADEA **must be filed in federal or state court WITHIN 90 DAYS of your receipt of this Notice**. Otherwise, your right to sue based on the above-numbered charge will be lost.

☐

The EEOC is continuing its handling of your ADEA case. However, if 60 days have passed since the filing of the charge, you may file suit in federal or state court under the ADEA at this time.

**Equal Pay Act (EPA):** You already have the right to sue under the EPA (filing an EEOC charge is not required.) EPA suits must be brought in federal or state court within 2 years (3 years for willful violations) of the alleged EPA underpayment. This means that **backpay due for any violations that occurred more than 2 years (3 years) before you file suit may not be collectible.**

If you file suit, based on this charge, please send a copy of your court complaint to this office.

On behalf of the Commission

*Samantha Salazar*

02/19/2020

(Date Mailed)

Enclosures(s)

for

**Rayford O. Irvin,**  
**District Director**

cc:

Megan Detzner  
 Senior Manager, EEO Compliance  
 UNITED AIRLINES, INC.  
 233 South Wacker Drive, HDQLD-11th Floor  
 Chicago, IL 60606

TWC - Civil Rights Division  
 101 East 15th St.  
 Guadalupe-CRD  
 Austin, TX 78778